

1 **UNITED STATES DISTRICT COURT**
2 **NORTHERN DISTRICT OF CALIFORNIA**

3 **JOE LEWIS LUQUE, et al.,**

4 **Plaintiffs,**

5 **v.**

3:09CV5885 (CRB)

6 **AT&T CORP., et al.,**

7 **Defendants.**
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10 **DECLARATION OF JEREMY HEISLER IN SUPPORT OF PLAINTIFFS' MOTION**
11 **FOR CONDITIONAL COLLECTIVE ACTION CERTIFICATION**
12 **AND ISSUANCE OF NOTICE TO THE COLLECTIVE ACTION CLASS**

13 I, JEREMY HEISLER, hereby declare as follows:

14 1. I am an attorney duly admitted to practice law in the State of New York
15 and am admitted *pro hac vice* in this action. I am a partner at the law firm of Sanford Wittels &
16 Heisler, LLP ("SW&H"). Together with Ram & Olson LLP and the Law Office of Edmond
17 Clark, I am counsel for Plaintiffs and the collective action class. I am familiar with all prior
18 proceedings and the nature of this case.

19 2. My co-counsel and I represent named Plaintiffs Joe Lewis Luque and
20 Herman Richardson, who are current or former "Field Managers" employed by Defendants
21 AT&T Corp. and the Pacific Bell Telephone Co. (collectively, "AT&T/PacBell").

22 3. Simultaneously with this Motion, Plaintiffs have filed a motion for leave
23 to amend their Complaint to name three additional plaintiffs: Paul Jenvey, Lee Seronello, and
24 Tom Norton. Plaintiffs' Counsel also represents Jenvey, Seronello, and Norton.

25 4. Additionally, Plaintiffs' Counsel represents the 61 AT&T/PacBell Field
26 Managers who have filed consent forms with the Court as required by the FLSA and "opted in"
27 to this suit.
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1 5. Attached hereto as Exhibit A is a true and correct copy of the U.S. District
2 Court for the District of Connecticut's decision in *Perkins v. Southern New England Tel. Co.*,
3 669 F.Supp.2d 212 (D.Conn. 2009).

4 6. Attached hereto as Exhibit B is a true and correct copy of Plaintiffs'
5 Proposed Notice of Court Certification of Collective Action.

6 7. Attached hereto as Exhibit C is a true and correct copy of the Declaration
7 of Joe Lewis Luque.

8 8. Attached hereto as Exhibit D is a true and correct copy of the Declaration
9 of Paul Jenvey.

10 9. Attached hereto as Exhibit E is a true and correct copy of the Declaration
11 of Herman Richardson.

12 10. Attached hereto as Exhibit F is a true and correct copy of the Declaration
13 of Tom Norton.

14 11. Attached hereto as Exhibit G is a true and correct copy of the Declaration
15 of Lee Seronello.

16 12. Attached hereto as Exhibit H is a true and correct copy of the Declaration
17 of Isabel Jimenez.

18 13. Attached hereto as Exhibit I is a true and correct copy of the Declaration
19 of Tiffany Paddock.

20 14. Attached hereto as Exhibit J is a true and correct copy of the Declaration
21 of Todd Richardson.

22 15. Attached hereto as Exhibit K is a true and correct copy of the Declaration
23 of Simon Ramos.

24 16. Attached hereto as Exhibit L is a true and correct copy of the Declaration
25 of Roberta Stavert.

26 17. Attached hereto as Exhibit M is a true and correct copy of the Declaration
27 of Robert Park.

1 18. Attached hereto as Exhibit N is a true and correct copy of the Declaration
2 of Patrick Cathcart.

3 19. Attached hereto as Exhibit O is a true and correct copy of the Declaration
4 of Michelle Marie Kimball.

5 20. Attached hereto as Exhibit P is a true and correct copy of the Declaration
6 of Maureen Lujan.

7 21. Attached hereto as Exhibit Q is a true and correct copy of the Declaration
8 of Vicki Harrison.

9 22. Attached hereto as Exhibit R is a true and correct copy of the Declaration
10 of Eric Wong.

11 23. Attached hereto as Exhibit S is a true and correct copy of the Declaration
12 of Fred Perez.

13 24. Attached hereto as Exhibit T is a true and correct copy of the Declaration
14 of John Bradley.

15 25. Attached hereto as Exhibit U is a true and correct copy of a Day in the
16 Life Model for AT&T/PacBell Field Managers.

17
18 I DECLARE UNDER THE PENALTIES OF PERJURY THAT THE FOREGOING IS TRUE
19 AND ACCURATE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

20 Dated: May 6, 2010
21 New York, New York

22 /Jeremy Heisler/
23 Jeremy Heisler
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